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JENNER & BLOCK LLP

July 19, 2024

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VIA ECF

The Honorable Dale E. Ho
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Watson v. NY Doe 1 et al.*, No. 19 Civ. 533 (DEH) (VF)

Dear Judge Ho,

We represent NY Doe 2 in the above-captioned case. Pursuant to Rule 4(e) of Your Honor's Individual Practices, we respectfully request oral argument on NY Doe 2's motion for summary judgment, filed on July 19, 2024. NY Doe 2's motion raises complex issues under defamation law and New York's recently amended anti-SLAPP statute, N.Y. Civ. Rights Law § 70-a and § 76-a, and we therefore believe that oral argument would aid the Court in deciding this case.

In addition, pursuant to Rules 3(e) and 4(e)(ii) of Your Honor's Individual Practices, we advise the Court that if oral argument were granted, it would be handled in whole by less-experienced attorneys, Kara Brandeisky, a fifth-year associate at Jenner & Block LLP, and Susanna Evarts, a sixth-year associate at Jenner & Block LLP. Ms. Brandeisky and Ms. Evarts were primary drafters of the memorandum and Rule 56.1 Statement of Undisputed Facts in support of NY Doe 2's motion, as well as NY Doe 2's anti-SLAPP counterclaim filed on October 8, 2021.

Once the motion for summary judgment is fully briefed, we are available at the Court's convenience.

Dated: New York, New York
July 19, 2024

Respectfully submitted,

By: /s/ Laura P. MacDonald

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